

Before the
National Highway Traffic Safety Administration
Washington, DC. 20590

In the Matter of

**Light Truck Average Fuel
Economy Standard,
Model Year 2004**

)
)
)
)
)
)
)

Docket No. NHTSA-2001-11048

COMMENTS of Nickolaus E. Leggett

The following are comments from Nickolaus E. Leggett, a technology analyst, an inventor holding two U.S. patents, and a certified electronics technician. These comments are directed at the establishment of a mileage standard for light trucks for the year 2004 and beyond.

The Standard Proposed by NHTSA

The National Highway Traffic Safety Administration (NHTSA) has proposed a corporate average fuel economy (CAFE) standard for light trucks manufactured in model year (MY) 2004. Their proposed standard is 20.7 miles per gallon (mpg). This is the same standard that was applied in the MY 1996 - 2003 standards.

Proposed Escalating Mileage Standard

I propose a modestly increased light truck mileage standard for MY 2004 followed by an escalating standard in following years. The standard for 2004 should be 21 mpg. This is a modest increase that can be accomplished by reducing the weight of the vehicle somewhat.

This increase would be the first step of an escalation of increases that would be carried out over several years.

A Model Year 2004 standard of 21 mpg would clearly communicate that the old approach of an unchanging standard was being set aside. This MY 2004 standard would be the first small step in mandated progress towards efficient light trucks.

Progress Towards Higher Efficiency

The first few years of escalating mileage standards could be accomplished by building progressively lighter vehicles. Over time, improvements to the engine and drive train would be required as well. Eventually, new engine options such as hybrid gasoline-electric and the fuel cell vehicles proposed by President Bush would probably be required to meet the mileage standard.

Benefits of Escalating Mileage Standards

Several benefits would result from establishing stricter mileage standards for light trucks starting in 2004:

- Air pollution emissions per vehicle would be reduced (given that the same efficiency of pollution control is applied).
- Total vehicular air pollution amounts would rise less rapidly than they otherwise would have (given that the number of vehicles on the roads increases).
- Dependency on petroleum supply from unreliable Middle Eastern sources would be reduced. This benefit would help the homeland defense effort of the war on terrorism.

- Development of superior motor vehicle propulsion technologies (advanced internal combustion, hybrid gasoline/electric, and fuel cell) would be first encouraged and then mandated.
- Increased export sales of American vehicles due to their higher efficiency and greater appeal in view of high overseas retail gasoline prices (due to foreign nations' gasoline taxes).

Time for the First Step

The time for talking the first step in developing efficient light truck standards is now. With even a modest first step of a 21 mpg standard, we will have started the progress towards modern 21st Century light trucks that will serve the public well, while also achieving the important public benefits identified above.

Respectfully submitted,

Nickolaus E. Leggett
1432 Northgate Square, Apt. 2A
Reston, VA 20190-3748
(703) 709-0752
nleggett@earthlink.net

January 21, 2002